

REMARKS/ARGUMENTS

1.) Claim Amendments

The Applicant has not amended any claims. Accordingly, claims 1-20 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

2.) Claim Rejections – 35 U.S.C. § 102(e)

Claims 1, 3, 4, 8-10, 13, 14, and 18-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Anupam, *et al.* (US 6,687,739). The Applicant respectfully disagrees.

It is important to remember that anticipation requires that the disclosure of a single piece of prior art reveals every element, or limitation, of a claimed invention. Furthermore, the limitation that must be met by an anticipatory reference are those set forth in each statement of function in a claims limitation, and such a limitation cannot be met by an element in a reference that performs a different function, even though it may be part of a device embodying the same general overall concept. Anupam fails to anticipate each and every limitation of claim 1. Therefore, claim 1 is not anticipated.

Claim 1 recites:

A method for providing privacy to a client accessing a chat application on a chat server, comprising the steps of:

transmitting a request for the chat application from the client to a first proxy server;

transmitting the request for the chat application from the first proxy server to a second proxy server;

providing a unique ID to the first proxy server from the second proxy server responsive to the request;

transmitting the request for the chat application and the unique ID from the second proxy server to the chat server;

transmitting a response and the unique ID from the chat server to the second proxy server responsive to the request;

storing the response at the second proxy server with the unique ID; and accessing the stored response from the first proxy server by providing the unique ID. (emphasis added)

The Applicant's invention relates to a method and system for ensuring privacy for chat participants from a service operator providing chat services. The Applicant's present invention uses two separate proxy servers. By utilizing two separate proxy servers, the client (chat participant) never interacts directly with the original chat server. The second proxy server associates the client with a unique user ID provided to the first proxy server by the second proxy server. The client requests information from the chat server via the first proxy server and the requested information is stored at the second proxy server. The client can then, via the first proxy server, access the requested information by means of the associated ID.

In contrast to the Applicant's invention, Anupam discloses a method for interactively sharing information between browsers in a network. Anupam does not disclose the use of two proxy servers. The Examiner stated that Anupam discloses transmitting the request for the chat application from the first proxy server to a second proxy server. The Applicant respectfully disagrees with this characterization. Anupam merely discloses the use of browsers, not proxy servers operating within a network (see col. 2, line 61-col. 3, line 20; FIG. 1). Anupam does not have any reference to the use of two separate proxy servers and a chat server. There is only one server mentioned in Anupam.

Furthermore, the Examiner stated that Anupam discloses providing a unique ID to the first proxy server from the second proxy server. The Applicant respectfully disagrees with this characterization. The user ID referred to in Anupam is not an identity only handled between a first and a second proxy and a chat server. Anupam merely disclose the use of a user ID. Additionally, the user ID disclosed in Anupam is merely used to authorize a user and not to access retrieved information from the chat server stored at the second proxy server.

The Examiner stated in the Office Action (see page 7, paragraph 8) stated that "a proxy server is a facility used by a client (i.e., like a browser)..." The Applicant respectfully disagrees with this statement. A browser does not equate to a proxy server. A browser, as correctly defined by Anupam, is a software program run on a computer that allows a computer user to request, view, manipulate, and/or send

information across a computer network. On the other hand, the Applicant uses each proxy server for far different functions.

Anupam fails to disclose utilizing two proxy servers and a unique ID handled between the first and second proxy server. Therefore, Anupam does not anticipate claim 1.

Similarly, independent claims 8 and 11 contain novel limitations analogous to claim 1. Therefore, those claims are also not anticipated by Anupam. Claims 3 and 4 depend from claim 1 and recite further limitations in combination with the novel elements of claim 1. Claims 9 and 10 depend from claim 8 and recites further limitations in combination with the novel elements of claim 8. Claims 13, 14, and 18-20 depend from claim 11 and recite further limitations in combination with the novel elements of claim 11. Therefore, the allowance of claims 1, 3-4, 8-10, 13, 14, and 18-20 is respectfully requested.

3.) Claim Rejections – 35 U.S.C. § 103 (a)

Claims 2, 5-7, 11, 12, and 15-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Anupam and further in view of Chaum (Communication of the ACM, Feb 1981, Volume 24, Number 2). The Applicant respectfully disagrees.

The Applicant's present invention uses two separate proxy servers. By utilizing two separate proxy servers, the client (chat participant) never interacts directly with the original chat server. The second proxy server associates the client with a unique user ID provided to the first proxy server by the second proxy server. The client requests information from the chat server via the first proxy server and the requested information is stored at the second proxy server. The client can then, via the first proxy server, access the requested information by means of the associated ID.

In contrast to the Applicant's invention, Anupam discloses a method for interactively sharing information between browsers in a network. Anupam does not disclose the use of two proxy servers. Furthermore, Anupam does not teach or suggest providing a unique ID to the first proxy server from the second proxy server. The user ID referred to in Anupam is not an ID only handled between a first and a second proxy

and a chat server. Additionally, the user ID disclosed in Anupam is merely used to authorize a user and not to access retrieved information from the chat server stored at the second proxy server.

Anupam fails to disclose utilizing two proxy servers and a unique ID handled between the first and second proxy server. Chaum does not make up the missing elements. Chaum merely discloses the use of untraceable emails. Thus, the combination of Anupam and Chaum do not teach or suggest the Applicant's claimed invention as recited in claim 1. In addition, claims 8 and 11 contain novel limitations analogous to claim 1. Therefore, Anupam and Chaum do not teach or suggest claims 8 and 11. Claims 2 and 5-7 depends from claim 1 and recites further limitations in combination with the novel elements of claim 1. Claims 12 and 15-17 depend from claim 11 and recites further limitations in combination with the novel elements of claim 11. Therefore, the allowance of claims 2, 5-7, 11-12, and 15-17 is respectfully requested.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

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